

THE HONORABLE BRIAN A. TSUCHIDA

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHRISTOPHER J. HADNAGY, an individual; and SOCIAL-ENGINEER, LLC, a Pennsylvania limited liability company,

Plaintiff,

v.

JEFF MOSS, an individual; DEF CON COMMUNICATIONS, INC., a Washington corporation; and DOES 1-10; and ROE ENTITIES 1-10, inclusive,

Defendants.

No. 2:23-cv-01932-BAT

**DEFENDANTS' MOTION FOR  
LEAVE TO FILE OVER-LENGTH  
BRIEF**

**Noted for Consideration:** February  
18, 2025

Pursuant to Local Civil Rule 7(f), Defendants Def Con Communications, Inc. and Jeff Moss (collectively, “Defendants”) respectfully seek leave to exceed the 8,400-word limit for their forthcoming motion for summary judgment (the “Motion”).

Good cause exists to exceed the word limits for the Motion. The discovery exchanged by the parties and non-parties in this case is extensive, including thousands of individual documents, over twelve depositions, and two expert reports, which makes it difficult to adequately address the claim and relevant facts within LCR 7(e)(3)’s 8,400-word response limit. In order to adequately lay the extensive factual foundation, Defendants require an additional 600 words to enumerate the facts and evidence at issue, and to demonstrate that no genuine issues of material fact exist.

Defendants respectfully request that the Court grant this motion to file an over-length brief.

DATED this 18th day of February 2025.

**PERKINS COIE LLP**

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